

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF  
NEW YORK**

**CASE NO.: 1:25-cv-05480**

PANORAMIC STOCK IMAGES, LTD  
D/B/A PANORAMIC IMAGES,

Plaintiff,

v.

C.G. JUNG FOUNDATION FOR  
ANALYTICAL PSYCHOLOGY, INC.,

Defendant.

**COMPLAINT FOR COPYRIGHT INFRINGEMENT**  
**(INJUNCTIVE RELIEF DEMANDED)**

Plaintiff PANORAMIC STOCK IMAGES, LTD D/B/A PANORAMIC IMAGES, by and through its undersigned counsel, brings this Complaint against Defendant C.G. JUNG FOUNDATION FOR ANALYTICAL PSYCHOLOGY, INC. for damages and injunctive relief, and in support thereof states as follows:

**SUMMARY OF THE ACTION**

1. Plaintiff PANORAMIC STOCK IMAGES, LTD DBA PANORAMIC IMAGES (“Panoramic”) brings this action for violations of exclusive rights under the Copyright Act, 17 U.S.C. §§ 106, 501, and 1202, to copy and distribute Panoramic's original copyrighted Work of authorship.

2. Panoramic has specialized in wide and large-format panoramic photography for over 25 years. Their global roster of acclaimed photographers captures the world in awe-inspiring detail, creating a collection of international images that include city skylines, landscapes, travel, lifestyles, cultural heritage, world destinations, and aerial views.

3. Defendant C.G. JUNG FOUNDATION FOR ANALYTICAL PSYCHOLOGY, INC. (“Defendant”) is an organization that provides programming on analytical psychology such as lectures, seminar series, continuing education classes, symposia, summer study programs, and workshops. Defendant obtains funding by charging attendees \$90–\$540 per person for many of its various programs and through membership. At all times relevant herein, Defendant owned and operated the internet website located at the URL <https://www.cgjungny.org/> (“Website”).

4. Panoramic alleges that Defendant copied Panoramic’s copyrighted Work from the internet to advertise, market, and promote Defendant’s business activities.

### **JURISDICTION AND VENUE**

5. This is an action arising under the Copyright Act, 17 U.S.C. §§ 501 and 1202.

6. This Court has subject matter jurisdiction over these claims under 28 U.S.C. §§ 1331 and 1338(a).

7. Defendant is subject to personal jurisdiction in New York.

8. Venue is proper in this district under 28 U.S.C. § 1391(b) and (c) and 1400(a) because the events giving rise to the claims occurred in this district, Defendant engaged in infringement in this district, Defendant resides in this district, and Defendant is subject to personal jurisdiction in this district.

### **DEFENDANT**

9. Defendant is a New York Corporation, with its principal place of business located at 28 East 39th Street, New York, New York 10016. Service may be made upon its Registered Agent, The Corp., at 815 Second Avenue, New York, NY 10017.

### **THE COPYRIGHTED WORK AT ISSUE**

10. In 1998, Shuji Shintani created the photograph entitled “PAN514458,” which is shown below and referred to herein as the “Work.”



11. On February 22, 2027, Shuji Shintani transferred all rights, title, and interest in the Work to Panoramic via an exclusive licensing agreement. Attached hereto as **Exhibit 1** is a true and correct copy of that agreement.

12. Panoramic registered the Work with the Register of Copyrights on December 22, 1998, and was assigned registration number VA 957-799. A true and accurate copy of the Certificate of Registration is attached hereto as **Exhibit 2**.

13. Panoramic makes the Work available for license on its own webpage, [www.panoramicimages.com](http://www.panoramicimages.com) (“Panoramic’s Website”).

14. At the time Panoramic published the Work on Panoramic's Website and all times thereafter, Panoramic offers numerous licensing options and price points designed to suit the licensor's needs and intended use.<sup>1</sup>

15. Panoramic's Work contains copyright management information (CMI) —namely, multiple stylized "P" watermarks that Panoramic embeds on the Work, Panoramic's name, Panoramic's Website, and the file name of the Work.

16. Panoramic's Work is protected by copyright but was not otherwise confidential, proprietary, or trade secret. The perspective, orientation, positioning, lighting, and other details of the Work are entirely original and creative. As such, the Work qualifies as subject matter protectable under the Copyright Act.

17. At all relevant times, Panoramic was the owner of the copyrighted Work.

#### **INFRINGEMENT BY DEFENDANT**

18. Defendant has never been licensed to use the Work for any purpose.

19. On a date after the Work at issue in this action was created, but prior to the filing of this action, Defendant copied the Work and used it on Defendant's Website.

20. On or about December 4, 2024, Panoramic discovered the unauthorized use of its Work on Defendant's Website.

21. Defendant copied Panoramic's copyrighted Work without Panoramic's permission.

22. After Defendant copied the Work, Defendant distributed the Work on the internet to promote the sale of Defendant's products and services.

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<sup>1</sup> <https://www.panoramicimages.com/terms>

23. Defendant copied and distributed Panoramic's copyrighted Work in connection with Defendant's business for purposes of advertising and promoting Defendant's business.

24. Defendant committed copyright infringement of the Work as evidenced by the documents attached hereto as **Exhibit 3**.

25. Panoramic never gave Defendant permission or authority to copy, distribute, or display the Work.

26. When Defendant copied and displayed the Work, Defendant removed Panoramic's CMI from the Work, as can be seen below.

**Panoramic's Work with watermarks and CMI:**



**Defendant's Use of the Work (missing all watermarks and CMI):**



27. Panoramic never gave Defendant permission or authority to remove the CMI from the Work.

28. Panoramic notified Defendant of the allegations set forth herein on December 17, 2024, January 6, 2025, February 10, 2025, and April 2, 2025. To date, the parties have failed to resolve the matter.

**COUNT I**  
**COPYRIGHT INFRINGEMENT**

29. Panoramic incorporates the allegations of paragraphs 1 through 28 of this Complaint as if fully set forth herein.

30. Panoramic owns a valid copyright in the Work.

31. Panoramic registered the Work with the Register of Copyrights pursuant to 17 U.S.C. § 411(a). See **Exhibit 2**.

32. Defendant copied, displayed, and distributed the Work at issue in this case and made derivatives of the Work without Panoramic's authorization in violation of 17 U.S.C. § 501.

33. Defendant performed the acts alleged in the course and scope of its business activities.

34. Defendant's acts were willful.

35. Panoramic has been damaged.

36. The harm caused to Panoramic is irreparable.

**COUNT II**  
**REMOVAL OF COPYRIGHT MANAGEMENT INFORMATION**

37. Panoramic incorporates the allegations of paragraphs 1 through 28 of this Complaint as if fully set forth herein.

38. The Work contains CMI, as defined in 17 U.S.C. § 1202(c), embedded into the Work and on Panoramic's Website.

39. Defendant removed each element of the CMI, Panoramic's watermarks, web address, and file name, from the Work before using and distributing the Work.

40. Defendant knowingly and with the intent to enable, conceal, or facilitate copyright infringement, displayed the Work on Defendant's Website without any of the CMI in violation of 17 U.S.C. § 1202(b).

41. Defendant distributed the Work to Defendant's Website knowing that the CMI had been removed or altered without the authority of the copyright owner or the law.

42. Defendant committed these acts knowing or having reasonable grounds to know that they would induce, enable, facilitate, or conceal infringement of Panoramic's rights in the Work.

43. Defendant caused, directed, and authorized others to commit these acts, knowing or having reasonable grounds to know that it would induce, enable, facilitate, or conceal infringement of Panoramic's rights in the Work.

44. Panoramic has been damaged.

45. The harm caused to Panoramic is irreparable.

WHEREFORE, Plaintiff PANORAMIC STOCK IMAGES, LTD DBA PANORAMIC IMAGES prays for judgment against Defendant C.G. JUNG FOUNDATION FOR ANALYTICAL PSYCHOLOGY, INC. that:

a. Defendant and its officers, agents, servants, employees, affiliated entities, and all of those in active concert with them, be preliminarily and permanently enjoined from committing the acts alleged herein in violation of 17 U.S.C. §§ 501 and 1202;

- b. Defendant be required to pay Panoramic its actual damages and Defendant's profits attributable to the infringement, or, at Panoramic's election, statutory damages, as provided in 17 U.S.C. §§ 504 and 1203;
- c. Panoramic be awarded its attorneys' fees and costs of suit under the applicable statutes sued upon;
- d. Panoramic be awarded pre- and post-judgment interest; and
- e. Panoramic be awarded such other and further relief as the Court deems just and proper.

**JURY DEMAND**

Panoramic hereby demands a trial by jury of all issues so triable.

Dated: July 2, 2025

Respectfully submitted,

/s/ Joseph A. Dunne

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